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October 15, 2021

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions to allow Mr. Goetsche to travel to the Southern District of New York on two occasions in November for in-person meetings with the undersigned counsel. The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services" and restricts his travel to the District of Colorado and the District of New Jersey.

The proposed modifications to the Court's Release Order are as follows:

- Detailed travel itineraries shall be provided to Pretrial Services for review and approval in advance of any travel.
- Mr. Goetsche shall remain in the presence of Danielle Goetsche, his wife and third-party custodian, during travel and while in New York except during in-person meetings with attorneys at either Kobre & Kim LLP, 850 Third Avenue, New York, New York or Smith Villazor LLP, 250 West 55th Street, New York, New York.
- Mr. Goetsche shall otherwise remain at the hotel in the presence of Ms. Goetsche during the duration of the trips under all applicable bail conditions.

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Pretrial Services has no objection to our proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

cc: Andrew Lourie, Esq.
Benjamin Sauter, Esq.
Amanda Tuminelli, Esq.
Government counsel of record (via ECF and e-mail)
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U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)